



DNRC Northwest Land Office
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Date January 21, 2025

District Ranger Nate Gassmann
12557 US Highway 37
Libby, MT 59921

Subject: Montana Department of Natural Resources and Conservation, Comments on the Pine Phlats Project Proposed Action

Dear Ranger Gassmann,

Thank you for the opportunity to comment on the proposed action for the Pine Phlats Fuels Reduction Project. The project area is within a “priority area” designated in the Montana Forest Action plan for high fire risk and forest health concerns. It is located immediately north and west of Libby, Montana in the Bobtail and Lower Pipe Creek area, west of Highway 37 and north of the Kootenai River Road. The area has been the focus of needed fuels treatments since receiving a priority designation under the Montana Forest Action plan for high risk and forest health concerns.

Additionally, the Pine Phlats area was designated as part of a wildfire resilience program in accordance with Section 605 of the Healthy Forest Restoration Act (HFRA) (16 U.S.C. 6591d) (FSH 1909.15, 32.3(9)). The project is in an area designated prior to March 23, 2018, in accordance with section 602(b) and (c) of the Healthy Forest Restoration Act. A hazardous fuels project may be carried out under this authority to reduce the risk or extent of, or increase the resilience to, insect or disease infestation, or to reduce hazardous fuels in the area (HFRA, Sections 602(d) and 603(a)).

The project area is evaluated in the Lincoln County CWPP utilizing wildfire risk to highly valued resources, flame length modeling, and Montana Forest Action Plan priority areas, based on fire and forest health risk. The 2001 Federal Register listing of communities at risk include but not limited to Libby, Bobtail, Sheldon Flats, Pipe Creek, Doak Creek (Red Dog area). These communities consist of a group of homes or other structures



with basic infrastructure and services, adjacent to federal land, that have conditions and values at high risk from wildfire and significant threats to life and property. Montana Department of Natural Resources and Conservation (DNRC) has fire protection interests within and adjacent to the planning area. Our agencies share the common goals of reducing fire risk and improving forest health in Montana's forest landscapes. The project is not only important for the national forest system lands but also for the state and private landowners in the area.

DNRC supports the stated need for the project which is to reduce tree densities and fuel loadings across the landscape including adjacent to private land, improve the diversity and resilience of vegetation communities, and contribute to continued timber production and economic sustainability. The purpose of the project aligns well with the Montana Forest Action Plan which emphasizes actions across boundaries to reduce wildfire risk and improve forest health, and retention of a forest industry in Montana.

Fire exclusion and tree growth have resulted in dense forest conditions that can support intense crown fires difficult to control which could threaten life and private property within the wildland-urban interface. Forest stands contain accumulations of surface fuels and multiple layers of tree canopies that serve as ladder fuels. Wildfire risk can be reduced through stand treatments that break fuel continuity across the landscape, managing for lower stand tree densities, reducing surface fuels, and restoring fire in the landscape.

DNRC supports the proposal which includes 2,392 acres of commercial vegetation treatments and 585 acres of non-commercial treatments on national forest lands. Slashing and piling and pile burning are proposed following noncommercial and commercial harvest activities. The proposed treatments would restore diverse vegetation conditions, reduce risk to uncharacteristic wildfire and insect and disease events, and provide wood supply and jobs to help sustain the local economy. The treatments on national forest lands will work together with treatments on adjacent state and private lands to improve forest health and reduce wildfire risk in this landscape. The DNRC believes this project is well suited to utilize Section 603 of the Healthy Forest Restoration Act (HFRA) categorical exclusion (CE) for planning purposes. The area being treated within the project area is 100 percent Forest Service land. However, Montana DNRC and Lincoln County lands are interspersed throughout the project area. To effectively address the heavy fuels and dense stands of trees found throughout the project area, consider lowering fuel loading in silviculture prescriptions to improve forest health and improve tree vigor for the remaining trees. As you develop the project, we propose including the WUI (wildland urban interface) boundary on a project area map and show or describe structures, infrastructure, and other values at risk. The primary objective for treatments in the WUI should be to reduce the intensity of fire behavior and increase options for safely protecting values at risk. To effectively reduce fire intensity, post-treatment stands should be open enough for fire to drop to the ground and not spread through the crowns. Consider adding shaded fuel breaks to enhance fire suppression and safe ingress-egress. These can be used as anchor areas for burning out to provide lines of defense near communities.

DNRC recommends the inclusion of a plan that prevents illegal access and user created trails in the project area.



Please include the effects of the No Action Alternative in your analysis, including the continued risk and impacts of uncharacteristic stand-replacing wildfires and insect and disease outbreaks. The No Action is underutilized and can be very powerful but regulated to one to two sentences.

The project analysis should include the relative effects of alternatives regarding carbon storage and sequestration. Climate modeling indicates the future will bring a higher frequency of severe fire seasons with extensive forested areas burned across the western U.S. There is potential for significant loss of forest cover and habitat, watershed, community values, and carbon sequestration and storage due to uncharacteristic large scale, stand-replacing fires. A key strategy found both in the Montana Forest Action Plan (2020) and Montana Climate Solutions Plan (2020) is to implement active management across ownership boundaries to reduce wildfire risk and sustain healthy forests and watershed function. Studies in the western U.S. are showing that treatments to reduce wildfire risk and improve forest health can reduce carbon initially but increase carbon in the long term. Healthy, vigorous forests capture carbon rapidly, in great capacity and for long periods of time storing it in tree stems, leaves, branches, roots, and soil. Also, wood harvested and developed into durable products are reservoirs of long-term carbon storage.

DNRC has a Good Neighbor Authority (GNA) program that provides state capacity for implementing restoration projects on the Kootenai Forest. The GNA program has capacity to assist with implementation of this project. But DNRC is very concerned about the percentage of Ponderosa Pine and low volume per acre within the commercial treatment units being proposed. Since 585 acres are being planned for non-commercial treatments and a large portion of those acres will be precommercial thinning, it is very imperative that the planned commercial treatments are viable and will yield adequate stumpage dollars back to the district to get this needed work completed.

DNRC is committed to continuing a positive working relationship with the Kootenai National Forest, specifically relating to landscape resiliency, wildfire response, community protection, and sustainable forest management. By working together, we can more effectively work towards an “all lands” approach to forest management and restoration, benefiting the missions of both agencies.

Sincerely,



Greg Poncin
Area Manager
Northwestern Land Office
MT Department of Natural Resources and Conservation

CC: Logan Sandman, Unit Manager, Libby Unit



Carol Hatfield, Local Government Forest Advisor



